

By ECF

February 19, 2020

The Honorable Lorna G. Schofield  
U.S. District Court, Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

Re: *In re Foreign Exchange Benchmark Rates Antitrust Litigation*,  
S.D.N.Y. Case No. 1:13-cv-7789 (LGS)

Dear Judge Schofield:

The undersigned counsel write pursuant to Your Honor's Order dated February 13, 2020 (ECF No. 1396), directing the relevant parties to explain whether they seek to have redactions applied to chat transcripts that are included in plaintiffs' proposed Hague Convention application to take the deposition of Robert de Groot.

We have reviewed plaintiffs' proposed motion papers, and have determined that neither redactions nor filing under seal are necessary with respect to the particular chats at issue here. This determination is based on a review of these particular chats. We do not intend to waive any rights with respect to any future filings including other chat transcripts that may contain confidential and sensitive material warranting such measures.

Respectfully submitted,

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\* Signatures used with permission pursuant to  
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